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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.)
)
TREVOR GRAHAM,)
)
Defendant.)

Criminal No. CR 06-0725 SI

**STIPULATION AND [PROPOSED]
ORDER EXCLUDING TIME**

The above-captioned matter came before the Court on February 16, 2007, for status. The defendant was represented by Gail Shifman, Esq., and Joseph Zeszotarski, Esq., and the government was represented by Jeffrey Finigan, Assistant United States Attorney. The matter was continued to March 30, 2007, at 11:00 a.m. in this Court for further proceedings.

The Court made a finding that the time from and including February 16, 2007, through March 30, 2007, should be excluded under the Speedy Trial Act, 18 U.S.C. § 3161(h)(8)(A),

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1 because the ends of justice served by taking such action outweighed the best interest of the public
2 and the defendant in a speedy trial. The finding was based on the need for the defendant to have
3 reasonable time necessary for effective preparation, taking into account the exercise of due
4 diligence, and for continuity of counsel pursuant to 18 U.S.C. § 3161(h)(8)(B)(iv).

5 The parties hereby agree to and request that the case be continued until March 30, 2007,
6 and that the exclusion of time until then be granted. The parties agree and stipulate that the
7 additional time is appropriate and necessary under Title 18, United States Code, § 3161(h)(8)(A),
8 because the ends of justice served by this continuance outweigh the best interest of the public and
9 the defendant in a speedy trial. This time exclusion will allow defense counsel to effectively
10 prepare, taking into account the exercise of due diligence, and will provide for continuity of
11 counsel for the defendant.

12
13 DATED: February 19, 2007

/s/

GAIL SHIFMAN
Counsel for Trevor Graham

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16 DATED: February 16, 2007

/s/

JEFFREY FINIGAN
Assistant U.S. Attorney

17
18
19 So ordered.

20 DATED:



SUSAN ILLSTON
UNITED STATES DISTRICT COURT JUDGE